

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHERYL BISHOP,

Plaintiff,

v.

WILLIAM BARR,

Defendant.

CASE NO. 18-00599-TSZ

DECLARATION OF SARAH K.
MOREHEAD

I, Sarah K. Morehead, am competent to testify and declare as follows based on my personal knowledge and a review of documents kept in the ordinary course of business:

1. I am an Assistant United States Attorney for the Western District of Washington and I represent the defendant in the above-captioned case.

2. On July 15, 2019, plaintiff supplemented her responses to defendant's first set of written discovery requests to produce copies of emails that were responsive to defendant's requests, but that plaintiff failed to produce previously. A true and correct copy of an email produced by plaintiff on July 15, 2019 and referenced in defendant's motion for summary judgment is attached hereto as Exhibit A.

3. Attached hereto collectively as Exhibit B are true and correct copies of affidavits signed during the investigation of plaintiff's EEO complaints.

4. Attached hereto as Exhibit C is a true and correct copy of the relevant pages of the deposition of plaintiff's deposition taken on October 19, 2017. Attached hereto as Exhibit D is a true and correct copy of the relevant pages of the deposition of plaintiff's deposition taken on July 3, 2019. Attached hereto as Exhibit E is a true and correct copy of the relevant pages of the deposition of Michael Hodnett taken on July 17, 2019. Attached hereto as Exhibit F is a true and correct copy of the relevant pages of the deposition of Celinez Nunez taken on October 6, 2017. Attached hereto as Exhibit G is a true and correct copy of the relevant pages of the deposition of Bradford Devlin taken on July 8, 2019. Attached hereto as Exhibit H is a true and correct copy of the relevant pages of the deposition of Celinez Nunez taken on July 8, 2019. Attached hereto as Exhibit I is a true and correct copy of the relevant pages of the deposition of Donald Robinson taken on October 3, 2017. Attached hereto as Exhibit J is a true and correct copy of the relevant pages of the deposition of Michael Gleysteen taken on October 4, 2017. Attached hereto as Exhibit K is a true and correct copy of the relevant pages of the deposition of Raphael Martinez taken on July 18, 2019. Attached hereto as Exhibit L is a true and correct copy of the relevant pages of the deposition of Douglas Dawson taken on October 18, 2017. Attached hereto as Exhibit M is a true and correct copy of the relevant pages of the deposition of Scott Dvorak taken on June 24, 2019. Attached hereto as Exhibit N is a true and correct copy of the relevant pages of the deposition of Gerald O'Sullivan taken on June 24, 2019. Attached hereto as Exhibit O is a true and correct copy of the relevant pages of the deposition of Kent Plemmons taken on June 24, 2019.

5. Attached is Exhibit P is a true and correct copy of ATF's Order on Merit Promotion Plan, which has been exchanged in discovery in this matter.

1 6. I declare under penalty of perjury under the laws of the United States, pursuant to 28 U.S.C.
2 § 1746, that the foregoing is true and correct.
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4 Executed this 8th day of August, 2019 at Seattle, Washington.
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6 s/ Sarah K. Morehead
7 Sarah K. Morehead
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